

Change 3 WBNE from 229A Wrightsville Beach to 229C3 Topsail Beach

Removal of WWTB, 280C3, from Topsail Beach (Change 2, above) would remove the only aural service from Topsail Beach. To restore aural service, the allocation for 229A at Wrightsville Beach, North Carolina, can be allotted on Channel 229C3 at Topsail Beach, North Carolina, using reference coordinates 34° 25' 37" North Latitude 77° 38' 33" West Longitude. From those coordinates a standard Class C3 facility will provide a 70 dBu Principal Community Contour over 100% of Topsail Beach, North Carolina. This allocation is fully space with respect to all existing allocations and with all proposed allocations except its existing Wrightsville Beach allocation. From the reference site, Table 3 identifies a short spacing of 0.06 kilometers. That short spacing rounds to zero and is permissible. Table 3 shows that the required spacings are met for all facilities of interest. Figure 7 shows that allowable area to locate.

From the proposed coordinates, the 60 dBu F(50,50) contour serves 210,102 persons in an area of 4,426.3 square kilometers. This represents a gain area of 2,728 square kilometers with a population of 47,078. The loss area is 379.7 square kilometers with a population of 26,577 persons. Both the gain and loss areas are well served with at least five full time aural services. Figure 8 shows the gain and loss areas with FM stations providing existing coverage. None of the allocations considered in this proposal are considered for counting existing services. The stations considered are: WGNI, WHQR, WKOQ, WKXB, WMNX, WQSL, WRNS-FM, WSFL-FM, and WXQR-FM. Areas of gain or loss over water are not considered.

Because the allotment to Topsail Beach is a replacement for an existing allotment, no analysis of urbanized area is provided.

Table 3
Topsail Beach Add
Allocation Study

REFERENCE
34 25 37 N
77 38 33 W

CLASS = C3
Current Spacings
Channel 229 - 93.7 MHz

DISPLAY DATES
DATA 03-18-05
SEARCH 03-19-05

Call	Channel	Location		Azi	Dist	FCC	Margin
RADD	ADD 229C3	Topsail Beach	NC	0.0	0.00	153.0	-153.00
RDEL	DEL 229A	Wrightsville Beach	NC	226.3	20.24	142.0	-121.76
WBNE	LIC-N 229A	Wrightsville Beach	NC	226.3	20.24	142.0	-121.76
WDZD	LIC-Z 228A	Ocean Isle Beach	NC	231.5	88.94	89.0	-0.06
WZKB	LIC 232A	Wallace	NC	318.5	49.24	42.0	7.24
WKXSFM	LIC 231A	Leland	NC	232.7	50.60	42.0	8.60
WERO	LIC 227C	Washington	NC	12.2	106.54	96.0	10.54
WZKB.A	APP-D 232A	Wallace	NC	323.1	55.40	42.0	13.40
WRQR	LIC 283A	Wilmington	NC	223.9	40.07	12.0	28.07
RADD	ADD 230C	Cary	NC	319.7	211.68	176.0	35.68
WRSN	LIC-D 230C	Burlington	NC	319.7	211.68	176.0	35.68
RDEL	DEL 230C	Burlington	NC	319.7	211.68	176.0	35.68
WJXYFM	LIC 230A	Conway	SC	240.1	130.74	89.0	41.74
WWEA	LIC 231C3	Oriental	NC	49.0	97.73	43.0	54.73
WXJY	LIC 229A	Georgetown	SC	230.3	199.92	142.0	57.92
WPYA	LIC 229C1	Chesapeake	VA	28.8	269.88	211.0	58.88
WSIM.C	CP 229A	Lamar	SC	263.7	206.01	142.0	64.01

Change 4 WBNU from 279C3 Shallotte to 279C2 Wrightsville Beach

Removal of WBNE, 229A, from Wrightsville Beach (Change 3, above) would remove the only aural service from Wrightsville Beach. To restore aural service, the allocation for 279C3 at Shallotte, North Carolina, can be allotted on Channel 279C2 at Wrightsville Beach, North Carolina, using reference coordinates 33° 59' 56" North Latitude 77° 54' 35" West Longitude. From those coordinates a standard Class C2 facility will provide a 70 dBu Principal Community Contour over 100% of Wrightsville Beach, North Carolina. This allocation is fully space with respect to all existing allocations and with all proposed allocations except its existing Shallotte allocation and the WWTB Topsail Beach allocation. Table 4 shows that the required spacings are met for all facilities of interest. Figure 9 shows that allowable area to locate.

From the proposed coordinates, the 60 dBu F(50,50) contour serves 238,871 persons in an area of 8,570.4 square kilometers. This represents a gain area of 5,920.9 square kilometers with a population of 191,617. The loss area is 2,062.9 square kilometers with a population of 49,347 persons. Both the gain and loss areas are well served with at least five full time aural services. Figure 10 shows the gain and loss areas with FM stations providing existing coverage. None of the allocations considered in this proposal are considered for counting existing services. The stations considered are: WGNI, WHQR, WKVC, WKXB, WLTT, WMNX, WWQQ, and WYAK-FM. Areas of gain or loss over water are not considered.

Because the allotment to Wrightsville Beach is a replacement for an existing allotment, no analysis of urbanized area is provided. Shallotte continues to receive full time aural service from WLTT, 292A, and WVCB (AM).

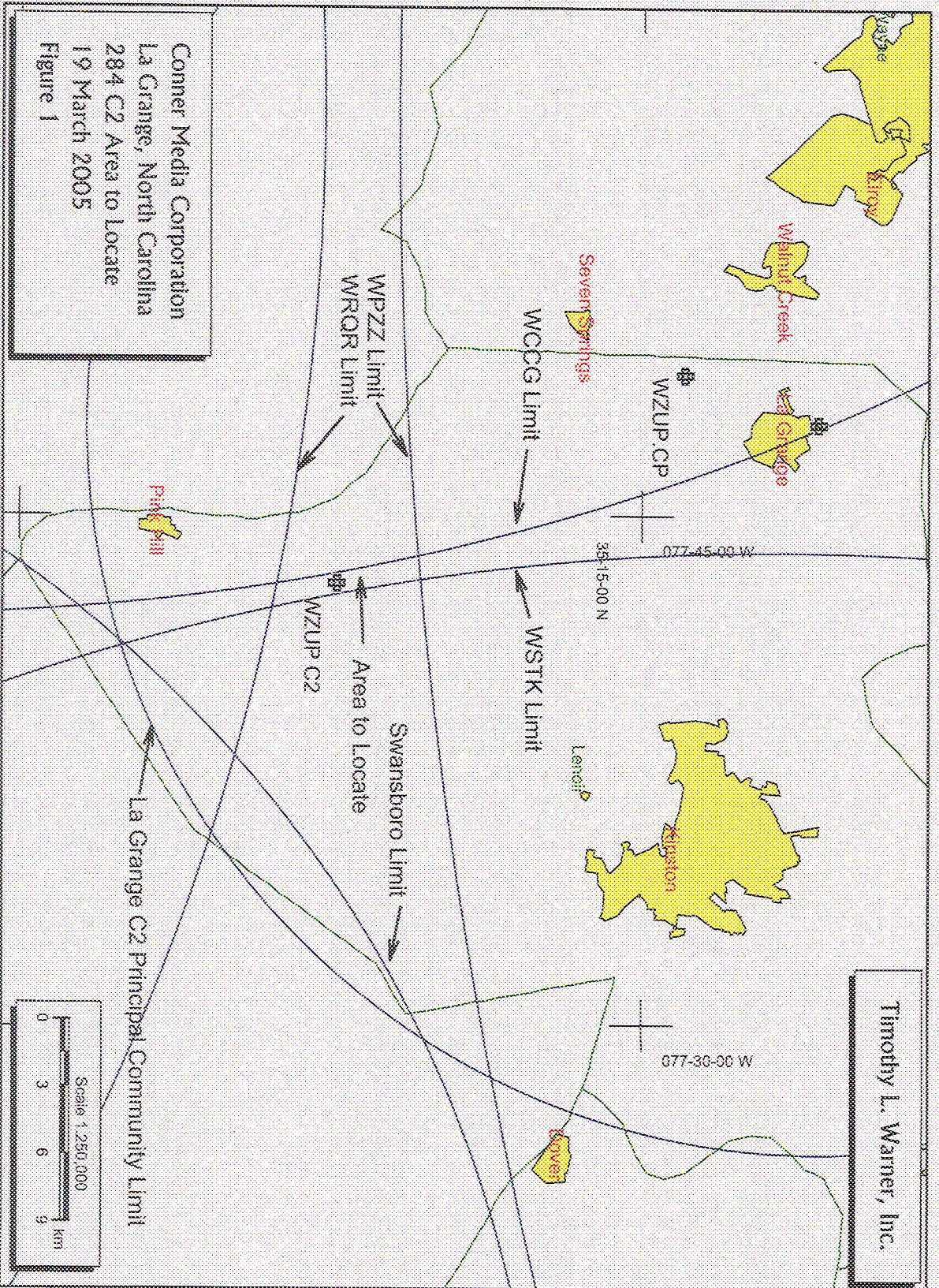
Table 4
Wrightsville Add
Allocation Study

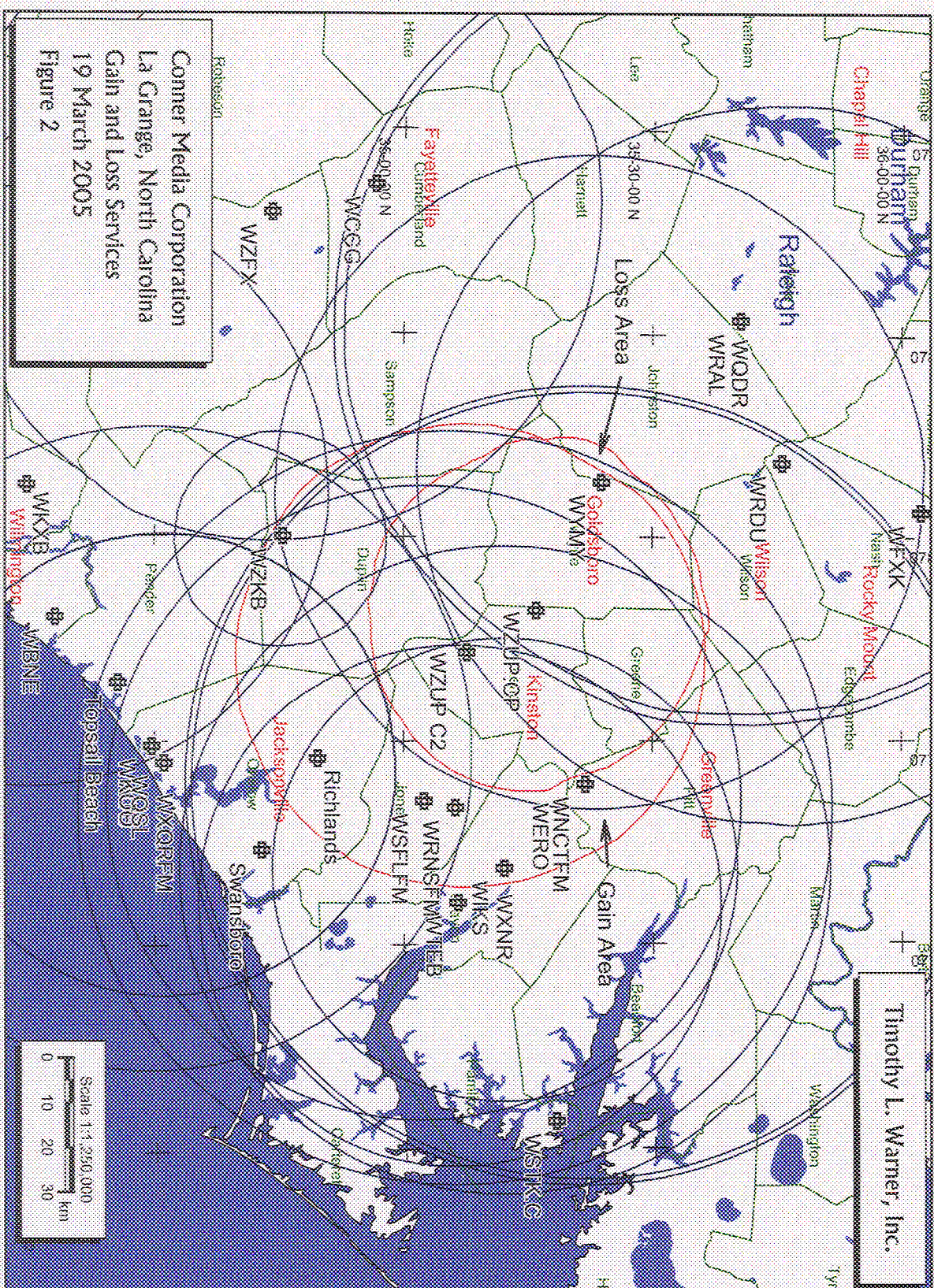
REFERENCE
33 59 56 N
77 54 35 W

CLASS = C2
Current Spacings
Channel 279 - 103.7 MHz

DISPLAY DATES
DATA 03-18-05
SEARCH 03-19-05

Call	Channel	Location	Azi	Dist	FCC	Margin
RADD	ADD 279C2	Wrightsville Beach NC	0.0	0.00	190.0	-190.00
WBNU	LIC 279C3	Shallotte NC	270.1	42.85	177.0	-134.15
RDEL	DEL 279C3	Shallotte NC	270.1	42.85	177.0	-134.15
ALLO	USE 279C3	Shallotte NC	267.4	42.88	177.0	-134.12
WWTB	LIC-N 280C3	Topsail Beach NC	35.0	67.24	117.0	-49.76
RDEL	DEL 280C3	Topsail Beach NC	35.0	67.24	117.0	-49.76
ALLO	USE 280C3	Topsail Beach NC	34.7	69.23	117.0	-47.77
WRHD	LIC-D 279C1	Williamston NC	21.6	226.89	224.0	2.89
WRCQ	LIC 278C2	Dunn NC	330.2	135.12	130.0	5.12
ALLO	USE 281C1	Myrtle Beach SC	247.0	114.72	79.0	35.72
Change of Community from Conway, SC.						
WYAV	LIC 281C1	Myrtle Beach SC	247.0	114.77	79.0	35.77
WYAKFM	LIC-N 276C3	Surfside Beach SC	255.4	92.73	56.0	36.73
WSOCFM	LIC-N 279C	Charlotte NC	299.5	290.11	249.0	41.11
RADD	281A	Swansboro NC	36.4	98.62	55.0	43.62
RADD	ADD 281A	Richlands NC	24.1	100.87	55.0	45.87
WEZL	LIC 278C1	Charleston SC	234.2	221.93	158.0	63.93



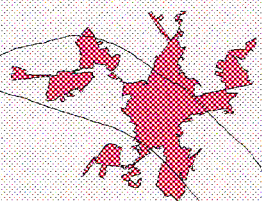


Timothy L. Warner, Inc.

Goldsboro, North Carolina Urbanized Area

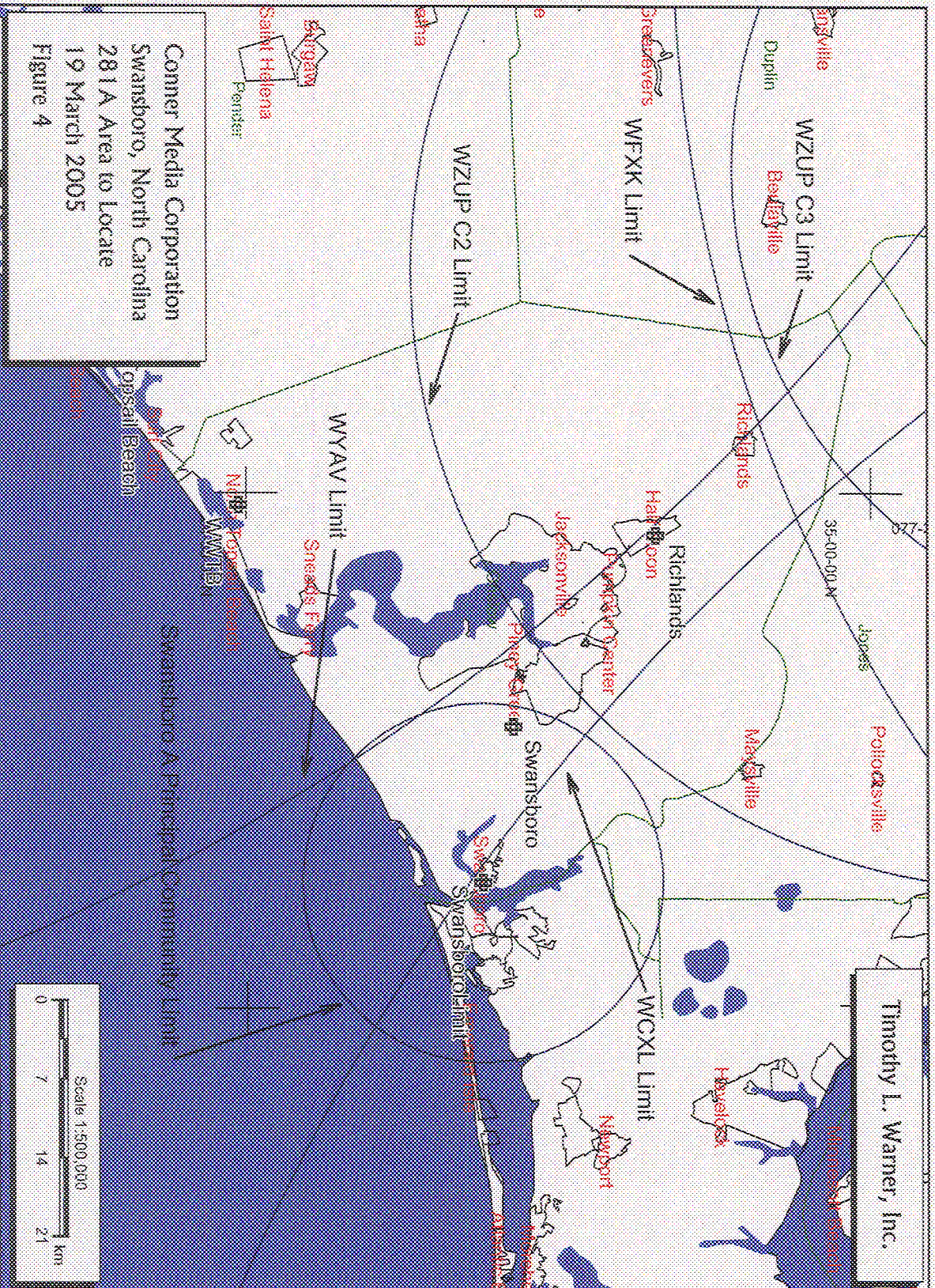
WZUP CP 70 dBu

WZUP C2 70 dBu



Commer Media Corporation
La Grange, North Carolina
Urbanized Area
19 March 2005
Figure 3





Timothy L. Warner, Inc.

Scale 1:1,250,000
0 10 20 30 km

Conner Media Corporation
Swansboro, North Carolina
Gain and Loss Services
19 March 2005
Figure 5

Timothy L. Warner, Inc.

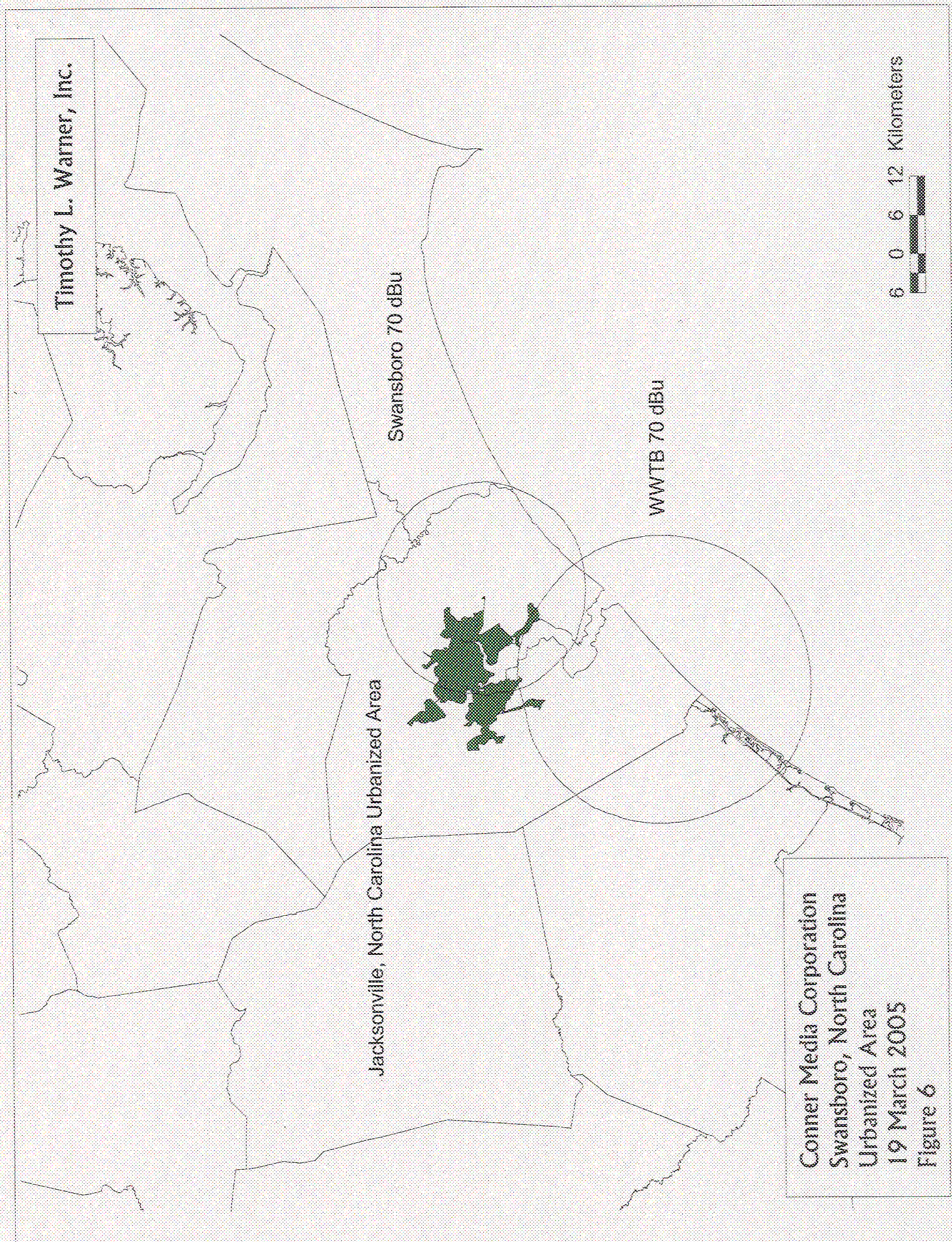
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0 10 20 30 km

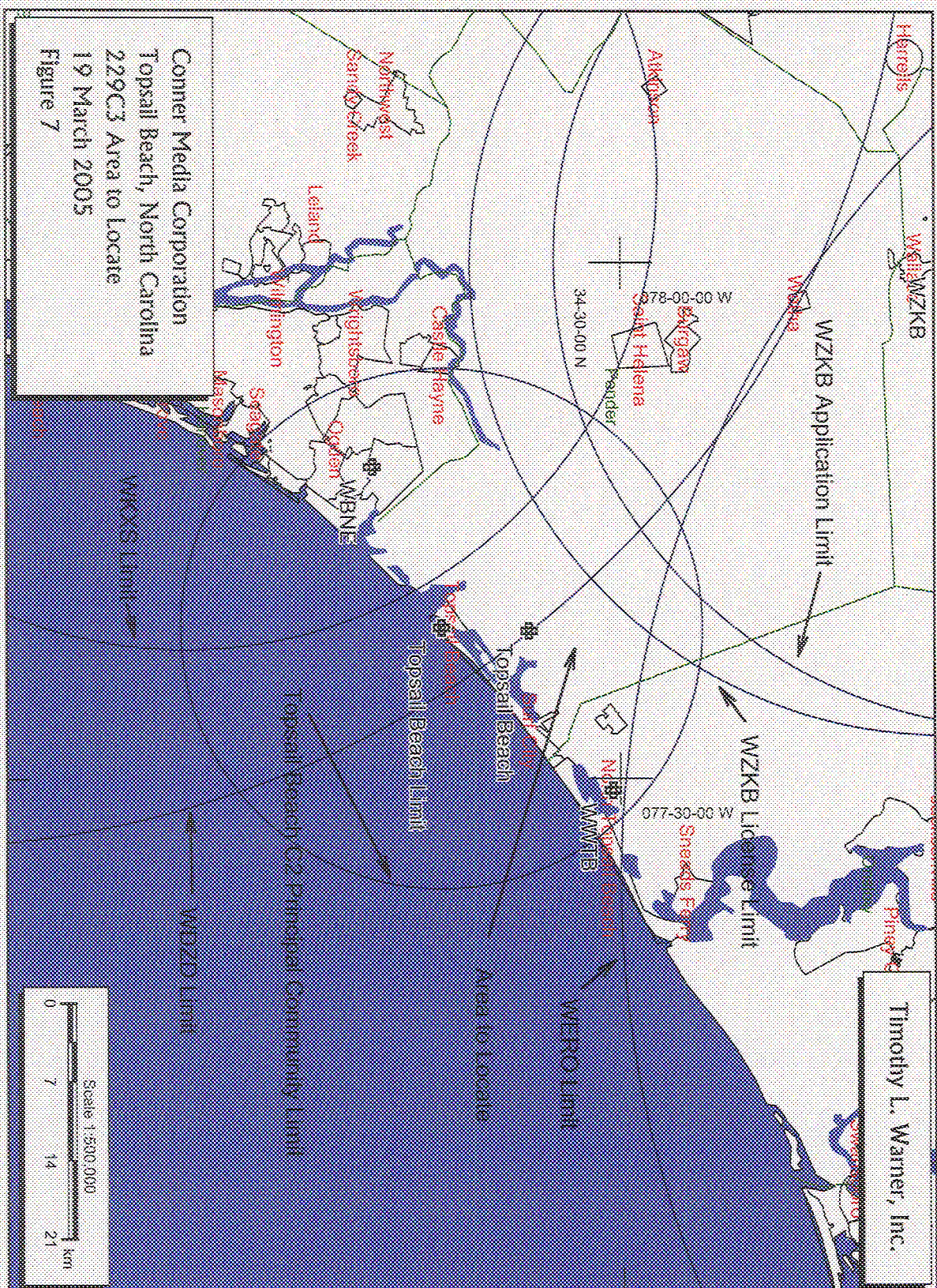
Conner Media Corporation
Swansboro, North Carolina
Gain and Loss Services
19 March 2005
Figure 5

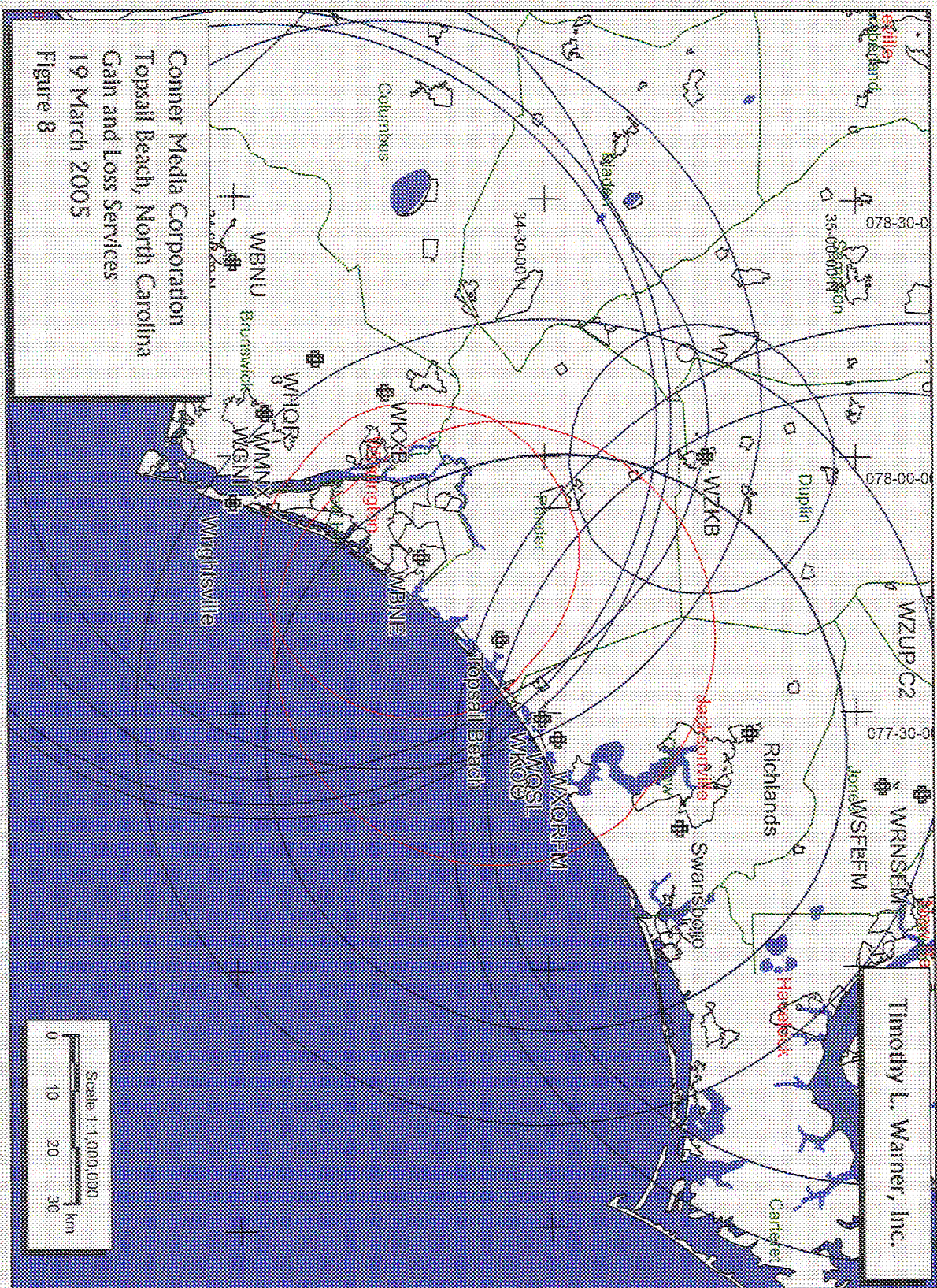
Timothy L. Warner, Inc.

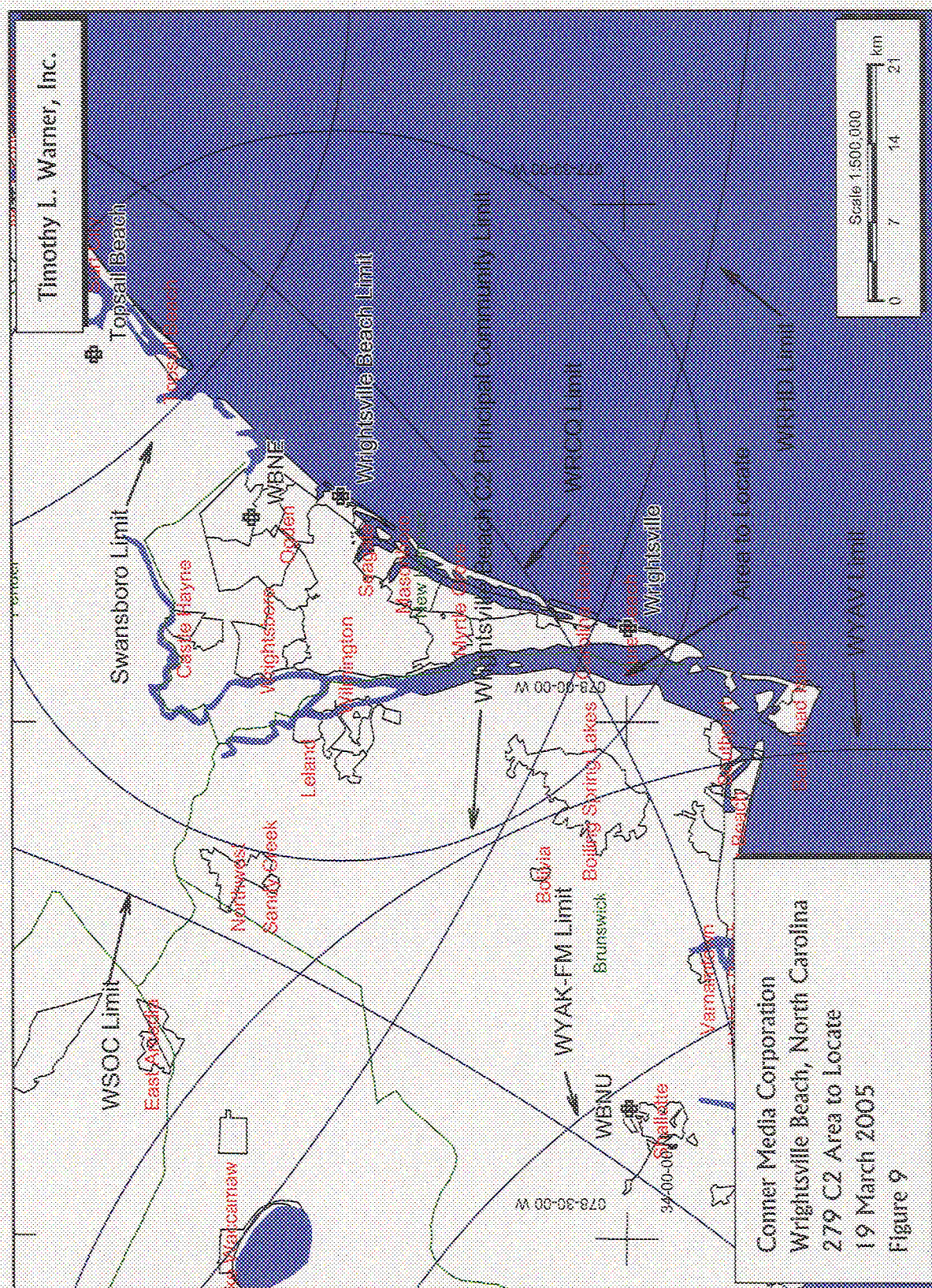
Scale 1:1,250,000
0 10 20 30 km

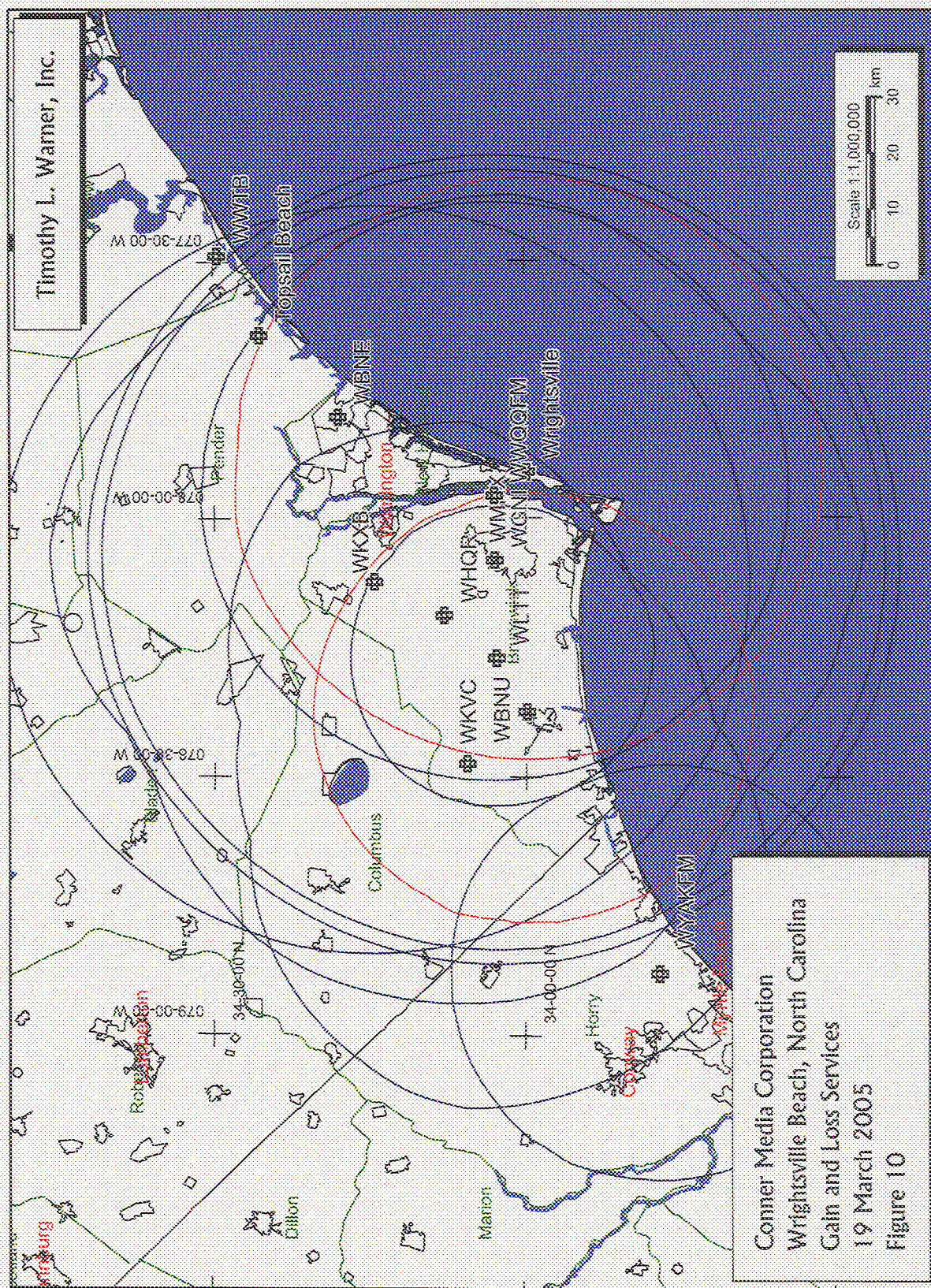
Conner Media Corporation
Swansboro, North Carolina
Gain and Loss Services
19 March 2005
Figure 5







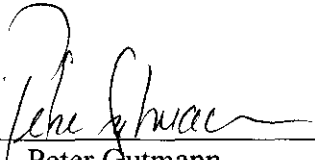




CERTIFICATE OF SERVICE

I, Peter Gutmann, an attorney at the law firm of Womble Carlyle Sandridge & Rice, PLLC, do hereby certify that true copies of the foregoing "Comments and Counterproposal of Conner Media Corporation" were mailed, postage prepaid on this 21st day of March, 2005, to the following:

John Griffith Johnson, Jr., Esquire
Paul, Hastings, Janofsky & Walker, LLP
1299 Pennsylvania Avenue, NW
Tenth Floor
Washington, DC 20004-2400



Peter Gutmann